

Inspection Date: June 11, 2020
Site Name: Patapsco WWTP
Facility Address: 3501 Asiatic Ave, Curtis Bay, MD 21226



Maryland Department of Environment
Water and Science Administration
Compliance Program
1800 Washington Blvd, Baltimore, MD 21230
410-537-3510

AI ID: 3076 **Inspector:** Ronald Wicks

Site Name: Patapsco WWTP
Facility Address: 3501 Asiatic Ave, Curtis Bay, MD 21226
County: Baltimore City

Inspection Date: June 11, 2020 **Start Date/Time:** June 11, 2020, 09:30 AM
End Date /Time: June 11, 2020, 02:30 PM

Media Type(s): NPDES Municipal Major Surface Water

Contact(s):	Mr. Neal Jackson - Manager
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NPDES Municipal Major Surface Water

Permit / Approval Numbers: 15DP0580

PAF Number: 20-2439

Site Status: Active

Site Condition: Noncompliance

Recommended Action: Close File

Inspection Reason: PAF

Evidence Collected:
Photos/Videos Taken, Visual Observation

Inspection Findings:

The Patapsco WWTP is an oxygen activated sludge treatment plant with biological aerated filters for nitrification and de-nitrification filters to meet ENR requirements. The treatment system consists of a grit removal system, mechanical screens and primary clarification, before secondary treatment. Final treatment consist of the following components: oxygen activated sludge reactors, secondary clarifiers, biological aerated filters for nitrification, de-nitrification filters, flow distribution chamber, chlorine contact chamber and cascade post aeration chamber.

On June 8, 2020, the Maryland Department of the Environment (Department) received a citizen's complaint of a spill in the area of Northridge Avenue & 4th Street in Wagner's Point, MD. The

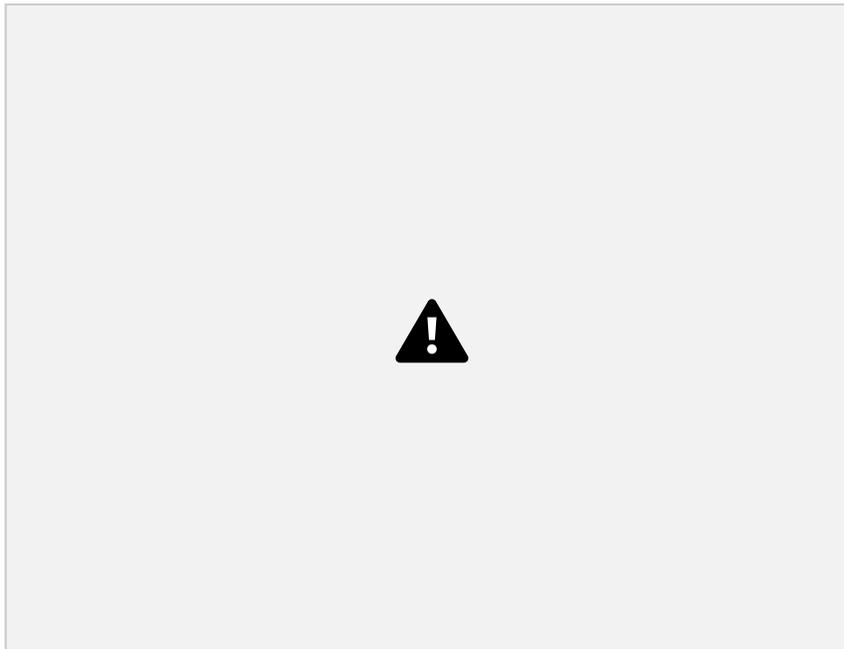
spill was traced back to the Patapsco WWTP by the investigating MDE Emergency Response Officer. The officer questioned the guard at the Patapsco WWTP guard shack. He was advised by her that the spill was raw sewage. The officer followed the spill down Asiatic Avenue to

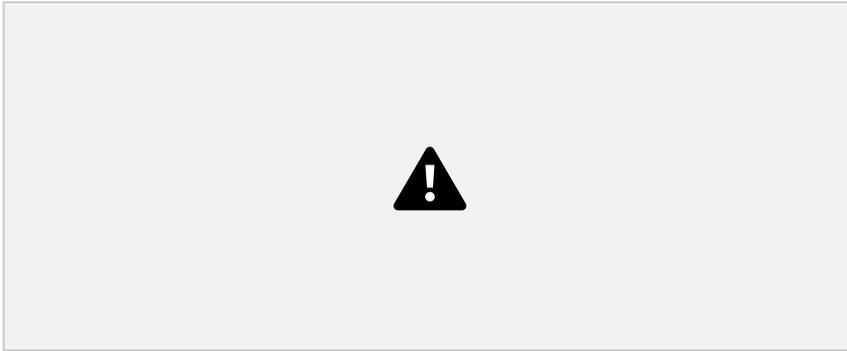
Northbridge Avenue, to East Patapsco Avenue to Pennington Avenue ending at the ramp to I-695. Since the spill was not oil, the complaint was referred to WSA. I contacted the Patapsco WWTP, Manager, Mr. Neal Jackson on June 9, 2020. During our discussion, Mr. Jackson informed me that the spill occurred on June 8, 2020 at approximately 7:45 AM by a CAM vehicle transporting raw sewage. Mr. Jackson explained that the CAM vehicle had been overfilled with liquid and leaked raw sewage during transport from the Patapsco WWTP to the Quarantine Road Landfill.

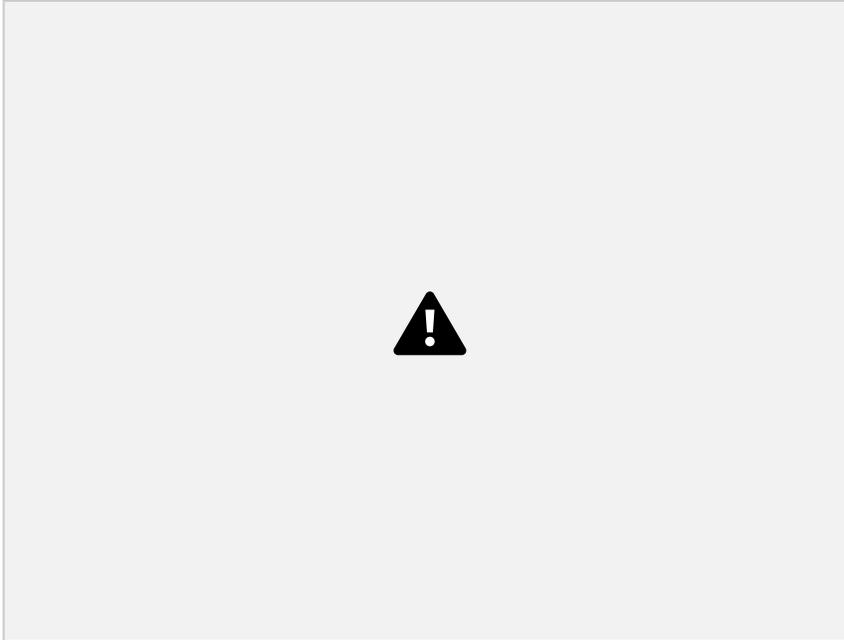
According to Mr. Jackson, approximately 60 – 100 gallons of raw sewage leaked from the vehicle during transport. Mr. Jackson further stated that the maintenance staff immediately began the cleanup by applying an absorbent to the liquid and then removing the material from the roadway. I asked Mr. Jackson to submit a letter of explanation within 5 days of our conversation. A root cause analysis, if not already done, should be performed to evaluate the event. This analysis should focus on the transport of raw sewage and biosolids operations and how to prevent spills of this nature.

At my request Mr. Jackson sent me pictures of the affected areas after the cleanup. Please see below:

A copy of this report was emailed to Mr. Jackson.







**NPDES Municipal Major Surface Waterbegin checklist\id 1000218483 end checklist\id -
 Inspection Checklist**

**NPDES Municipal Major Surface Waterbegin checklist\id 1000218483 end checklist\id -
 Inspection Checklist**

<i>Inspection Item</i>	<i>Status</i>	<i>Comments</i>
1. Does the facility have a discharge permit? [Environment Article §9-323(a)(1-3)]	No Violations Observed	begin checklist_item 1000218483 29787 1end checklist_item 1000218483 29787 AIOO 3076
2. Is the discharge permit current? [Environment Article §9-328(a)(1)]	No Violations Observed	begin checklist_item 1000218483 29788 2end checklist_item 1000218483 29788 AIOO 3076
3. If the permit is not current, has facility applied for renewal? [Environment Article §9-328(a)(1)]	Not Applicable	begin checklist_item 1000218483 29789 3end checklist_item 1000218483 29789 AIOO 3076
4. Does the facility operate as authorized bytheir current permit? [COMAR 26.08.04.01B(4)]	Not Evaluated	begin checklist_item 1000218483 29790 4end checklist_item 1000218483 29790 AIOO 3076
5. Has the Permittee exceeded the permitted capacity of the WWTP? [40 CFR Part 122 Subpart C Section 122.42.(b)(1-3)]	Not Evaluated	begin checklist_item 1000218483 29791 5end checklist_item 1000218483 29791 AIOO 3076
6. Is the number and location of discharge points as described in the discharge permit? [Environment Article §9-331]	Not Evaluated	begin checklist_item 1000218483 29792 6end checklist_item 1000218483 29792 AIOO 3076
7. Has permittee submitted correct name and address of receiving waters? [40 CFR 122.21.(j)(3)]	No Violations Observed	begin checklist_item 1000218483 29793 7end checklist_item 1000218483 29793 AIOO 3076
8. Is the permittee meeting the compliance schedule per permit requirements? [COMAR 26.08.04.02-1A(3)]	Not Evaluated	begin checklist_item 1000218483 29794 8end checklist_item 1000218483 29794 AIOO 3076

9. Has the operator or superintendent been certified by the Board in the appropriate classification for the facility? [COMAR 26.06.01.05A(1)]	Not Evaluated	begin checklist_item 1000218483 29795 9end checklist_item 1000218483 29795 AIOO 3076
10. Are adequate records being maintained for the sampling date, time, and exact location; analysis dates and times; individual performing analysis; and analytical results? [COMAR 26.08.04.03B(3)(a, b, c, e)]	Not Evaluated	begin checklist_item 1000218483 29796 10end checklist_item 1000218483 29796 AIOO 3076
11. Are adequate records being maintained for the analytical methods/techniques used? [COMAR 26.08.04.03B(3)(d)]	Not Evaluated	begin checklist_item 1000218483 29797 11end checklist_item 1000218483 29797 AIOO 3076
12. Does the permittee retained a minimum of 3 years worth of monitoring records including raw data and original strip chart recordings; calibration and maintenance records; and reports? [COMAR 26.08.04.03B(1)]	Not Evaluated	begin checklist_item 1000218483 29798 12end checklist_item 1000218483 29798 AIOO 3076
13. Do lab records reflect that lab and monitoring equipment are being properly calibrated and maintained? [Environment Article §9-331]	Not Evaluated	begin checklist_item 1000218483 29799 13end checklist_item 1000218483 29799 AIOO 3076
14. Does the permittee/laboratory use suitable QA/QC procedures and operate a formal quality assurance (QA) program using appropriate controls? [40 CFR Part 136.7]	Not Evaluated	begin checklist_item 1000218483 29800 14end checklist_item 1000218483 29800 AIOO 3076
15. Has the permittee submitted the monitoring results on the proper Discharge Monitoring Report form? [COMAR 26.08.04.03C(1)]	Not Evaluated	begin checklist_item 1000218483 29801 15end checklist_item 1000218483 29801 AIOO 3076
16. Do the Discharge Monitoring Reports reflect permit conditions? [COMAR 26.08.04.03C]	Not Evaluated	begin checklist_item 1000218483 29802 16end checklist_item 1000218483 29802 AIOO 3076
17. Has the permittee submitted these results within the allotted time electronically? [COMAR 26.08.04.03C(2), 40 CFR Part 127.16]	Not Evaluated	begin checklist_item 1000218483 29803 17end checklist_item 1000218483 29803 AIOO 3076
18. Is the facility being properly operated and maintained including:(a) stand-by power or equivalent provisions available, (b) adequate alarm system for power or equipment failure available, (c) all treatments units are in service, . [40 CFR Part 122 Subpart C Section 122.41.e]	Not Evaluated	begin checklist_item 1000218483 29804 18end checklist_item 1000218483 29804 AIOO 3076
19. Is sewage sludge managed correctly per permit requirements? [COMAR 26.04.06.09]	Out of Compliance	begin checklist_item 1000218483 29805 19See narrative section of this reportend checklist_item 1000218483 29805 AIOO 3076
20. If a by-pass occurred since last inspection, has the permittee submitted notice of the by-pass within the allotted time? [40 CFR Part 122 Subpart C Section 122.41.m(4)(i)(C)]	Not Evaluated	begin checklist_item 1000218483 29806 20end checklist_item 1000218483 29806 AIOO 3076
21. If a non-complying discharge occurred since the last inspection, was the regulatory	Not Evaluated	begin checklist_item 1000218483 29807 21end checklist_item 1000218483 29807 AIOO 3076

agency notified within the allotted time? [40 CFR Part 122 Subpart C Section 122.41.(6)]		
22. If applicable, has the permittee complied with all special conditions of their permit? [COMAR 26.08.03.07D]	Not Evaluated	begin checklist_item 1000218483 29808 22end checklist_item 1000218483 29808 AIOO 3076
23. Have overflows occurred since the last inspection? [COMAR 26.08.10.02A]	Not Evaluated	begin checklist_item 1000218483 29809 23end checklist_item 1000218483 29809 AIOO 3076
24. Have records of overflows been maintained at the facility for at least five years? [COMAR 26.08.10.06A-B]	Not Evaluated	begin checklist_item 1000218483 29810 24end checklist_item 1000218483 29810 AIOO 3076
25. Are flow measuring devices properly installed and operated, calibration frequency of flow meter adequate, flow measurement equipment adequate to handle expected ranges of flow? [40 CFR Part 122 Subpart C Section 122.41.e]	Not Evaluated	begin checklist_item 1000218483 29811 25end checklist_item 1000218483 29811 AIOO 3076
26. Are discharge monitoring points adequate for representative sampling? [Environment Article §9-331(4)]	Not Evaluated	begin checklist_item 1000218483 29812 26end checklist_item 1000218483 29812 AIOO 3076
27. Do parameters and sampling frequency meet the minimum requirements? [Environment Article §9-331(4)]	Not Evaluated	begin checklist_item 1000218483 29813 27end checklist_item 1000218483 29813 AIOO 3076
28. Does the permittee use the method of sample collection required by the permit? [Environment Article §9-331(4)]	Not Evaluated	begin checklist_item 1000218483 29814 28end checklist_item 1000218483 29814 AIOO 3076
29. Are analytical testing procedures used approved by EPA? [COMAR 26.08.01.02B(1)]	Not Evaluated	begin checklist_item 1000218483 29815 29end checklist_item 1000218483 29815 AIOO 3076
30. If alternate analytical procedures are being used, has proper approval been obtained? [COMAR 26.08.01.02B(1)]	Not Evaluated	begin checklist_item 1000218483 29816 30end checklist_item 1000218483 29816 AIOO 3076
31. Has the permittee notified the Department of the name and address of the commercial laboratory? [COMAR 26.08.04.03A(3)]	Not Evaluated	begin checklist_item 1000218483 29817 31end checklist_item 1000218483 29817 AIOO 3076
32. Were discharges observed at the authorized outfalls? [Environment Article §9-314(b)(1)]	Not Evaluated	begin checklist_item 1000218483 29818 32end checklist_item 1000218483 29818 AIOO 3076
33. If discharges were observed, do the discharges or receiving waters have any visible pollutants observed? [Environment Article §9-314(b)(1)]	Not Evaluated	begin checklist_item 1000218483 29819 33end checklist_item 1000218483 29819 AIOO 3076
34. Were discharge samples collected? [Environment Article §9-261(c)(1)]	Not Evaluated	begin checklist_item 1000218483 29820 34end checklist_item 1000218483 29820 AIOO 3076
35. Does this facility have coverage under a a NPDES stormwater discharge permit? [40 CFR Part 122 Subpart B Section 122.26.(c)(1)(I)(A-B)]	Not Evaluated	begin checklist_item 1000218483 29821 35end checklist_item 1000218483 29821 AIOO 3076
36. If the permittee has coverage under a NPDES storm water permit, has a storm water pollution prevention plan been developed and implemented as required? [40 CFR Part 122 Subpart B Section 122.26.(c)(1)(I)(A-B)]	Not Evaluated	begin checklist_item 1000218483 29822 36end checklist_item 1000218483 29822 AIOO 3076

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37. Are the permit conditions being met? [Environment Article §9-326(a)(1)]	Not Evaluated	begin checklist_item 1000218483 29823 37end checklist_item 1000218483 29823 AIOO 3076
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Ronald Wicks/Date
ron.wicks@maryland.gov
410-537-3510

Inspector: **Ronald A. Wicks 6/12/2020**

Received by:

Signature/Date

Print Name

Report Provided to:

- Fax
- Email Neal Jackson
- Regular Mail
- Certified Mail